

Before the
POSTAL REGULATORY COMMISSION
Washington, DC 20268-0001

Mail Processing Network Rationalization
Service Changes, 2012

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Docket No. N2012-1

NATIONAL POSTAL MAIL HANDLERS UNION INTERROGATORIES TO USPS
WITNESS DAVID WILLIAMS (NPMHU/USPS-T1-1-12)

Pursuant to Rules 25 through 28 of the Commission's Rules of Practice and Procedure, the National Postal Mail Handlers Union ("NPMHU") hereby submits the following interrogatories to USPS witness David Williams, USPS-T1. If the witness is unable to respond to any interrogatory, please redirect the interrogatory to a more appropriate USPS witness.

Instructions and Definitions

"USPS" or "Postal Service" means the United States Postal Service, its employees, agents, witnesses, and all other persons who act under the direction of the United States Postal Service, including but not limited to consultants and other independent contractors.

"Mail Processing Network Rationalization Service Changes, 2012" (MPNR) or means the proposed restructuring of the USPS's mail distribution and transportation

network presented to the PRC in its December 5, 2010 “Request of the United States Postal Service for an Advisory Opinion on Changes in the Nature of Postal Services.”

“MNPR Network” means the mail distribution and transportation network required to implement the USPS’ MNPR and that, inter alia, accommodates the USPS’s elimination of 252 mail processing facilities.

“Documents” has the meaning as ascribed within the federal Rules of Civil Procedure and includes any documents or things that constitute or contain matters that are relevant to the subject matter of this proceeding and that are in the custody or control of the USPS.

“Losing facility” is defined and used herein in the same manner as it is defined and used in Section 1-1.2 of the PO-408 handbook.

“Gaining facility” is defined and used herein in the same manner as it is defined and used in Section 1-1.2 of the PO-408 handbook. The term document has the same meaning as ascribed within the federal Rules of Civil Procedure.

The term “person” means any natural person, corporation, partnership, proprietorship, association, organization or group of natural individuals.

The term “identify,” when used with regard to a person means to provide the full name, position, address and telephone number of the person.

The term “identify,” when used with regard to a document means to describe the subject matter of the document, its author, its date and any addressee.

Interrogatories

NPMHU/USPS-T1-1 Please explain how the proposed change in service standards would be applied, if the Postal Service also moves to a five day delivery schedule. For instance, on what day would mail entered on a Friday (day zero) with a two day service standard be delivered?

NPMHU/USPS-T1-2 Please confirm that critical acceptance times (e.g., blue box drop off times) may be moved up in locations where a facility is closed, in order for mail to be moved longer distances to the gaining processing facility.

NPMHU/USPS-T1-3 If (2) is confirmed, please state whether the Postal Service has made any projections of how many critical acceptance times will need to be changed, or by how much. If any projections have been made, please provide those projections.

NPMHU/USPS-T1-4 On page 7 of the Request for Approval, the Postal Service states that the “for competitive products such as Express Mail and Priority Mail. . . , network changes being planned could result in changes in expected delivery days between specific 3-digit ZIP Code origin/destination pairs.” Please provide all information related to the possibility of such changes, including any estimates by the Postal Services of the likelihood of such changes overall, or for specific ZIP Code pairs.

NPMHU/USPS-T1-5 On page 3 of witness Bradley's testimony, he states that he did not consider transition or implementation costs in his estimates.

- a. Please state whether the Postal Service has included these costs anywhere in its estimates of savings, and, if so, please cite to the record where this may be found.
- b. If the Postal Service has not included these costs in its estimates of savings, please state whether the Postal Service has made any calculations of transition and implementation costs associated with its proposal.
- c. If the answer to (b) is yes, please provide those calculations.

NPMHU/USPS-T1-6 Please compare the scope of the prior round of AMP studies and consolidations (*i.e.*, those associated with the 2008 network redesign initiative and occurring prior to the filing in this docket) with the scope of the consolidations proposed in the current docket, including in your answer the number of facilities affected, the total number of facility closures, the percentage of mail volume affected, and the number of career postal employees affected.

NPMHU/USPS-T1-7 Please describe, and providing any supporting documentation for, any problems, or reports of problems, associated with previous consolidations of which the Postal Service is aware, including but not limited to traffic problems surrounding the Baltimore facility (*see, e.g.*, <http://www.wbalv.com/r/29985356/detail.html>), and traffic problems surrounding the

Memphis facility (see, e.g., <http://www.wmctv.com/story/16347301/trucks-stuck-for-hours-waiting-to-unload-christmas-mail>).

NPMHU/USPS-T1-8 Please describe and provide any supporting documentation for:

- (a) any remedial steps taken by the Postal Service to address any problems or reports of problems referenced in response to Interrogatory NPMHU/USPS-T1-7;
- (b) what steps the Postal Service has taken to anticipate and avoid problems associated with the consolidation of large processing facilities and the attendant substantial increase of incoming and outgoing mail into the remaining facilities; and
- (c) whether those steps are different from the steps taken in the pre-docket consolidations and, if so, how.

NPMHU/USPS-T1-9 For each AMP study that has been noticed but not yet approved or withdrawn, please state:

- a) when the public hearing for this study will occur (if it has not yet occurred);
- b) whether the study is currently under review before the applicable Area Vice President;
- c) whether the study is currently under review by the Senior Vice President of Operations; and
- d) when you anticipate releasing the results of the study.

NPMHU/USPS-T1-10 What criteria, if any, has the Postal Service applied in deciding upon the timing and priority of review for the two hundred and fifty-two AMP studies associated with this docket (*i.e.*, those listed in Library Reference 6 of your testimony)? For example, has the relative timing of the public hearings of these AMP studies been based on the size of the facilities involved, the complexity of the potential consolidation, some assessment of the relative feasibility of the consolidation, or any other factor or combination of factors? On what basis has the Senior Vice President of Operations determined the order in which these studies will be reviewed and potentially approved?

NPMHU/USPS-T1-11 Please confirm that the Postal Service does not issue a final AMP study where the decision is made that the proposed consolidation is infeasible, not cost effective or otherwise not in the best interests of the Postal Service. If not confirmed, please explain the circumstances under which the Postal Service will release such an AMP study rather than withdrawing the study or holding it in abeyance.

NPMHU/WILLIAMS-12 On page 8 of the Postal Service's January 9, 2012 Statement, the Postal Service commits to file in this docket copies of AMP decisions "expeditiously" after those decisions have been made and collective bargaining agreement notice obligations are fulfilled. Does the Postal Service intend:

- a) to fulfill its obligations notices under the collective bargaining agreements and file docket copies of these studies in the same order that the AMP decisions are

made? If not, please specify the criteria that will establish the order in which these decisions will be announced and filed;

- b) to file with the Commission copies of the papers associated with those AMP studies that are withdrawn or cancelled due to a determination that the proposed consolidation is infeasible, not cost-effective or otherwise not in the best interest of the Postal Service?

Respectfully submitted,

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